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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**AURORA LOAN SERVICES, LLC,**

Plaintiff,

vs.

**DAVID SADEK; WINTHROP ABSTRACT, LLC;  
FIRST FINANCIAL EQUITIES, INC.; THE  
CLOSING NETWORK, LTD.; 100 W. 58<sup>TH</sup>  
STREET. 7C, LLC; MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.; JP MORGAN  
CHASE BANK, N.A.; BOARD OF MANAGERS  
WINDSOR PARK CONDOMINIUM; WINDSOR  
TOV, LLC, FREMONT INVESTMENT & LOAN;  
JOHN DOES 1-10,**

Defendants.

DOCKET No.: 09-CV-9651(HB)

CIVIL ACTION

**ANSWER AND CROSS-CLAIMS OF JP  
MORGAN CHASE BANK, N.A. TO  
AMENDED COMPLAINT**

JP Morgan Chase Bank, NA (hereinafter "Chase") by way of Answer to the Amended Complaint says that:

**THE PARTIES**

1. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 1 of the Amended Complaint.
2. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 2 of the Amended Complaint.

3. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 3 of the Amended Complaint.

4. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 4 of the Amended Complaint.

5. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 5 of the Amended Complaint.

6. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 6 of the Amended Complaint.

7. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 7 of the Amended Complaint.

8. Chase admits the allegations contained in paragraph 8 of the Amended Complaint.

9. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 9 of the Amended Complaint.

10. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 10 of the Amended Complaint.

11. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 11 of the Amended Complaint.

12. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 12 of the Amended Complaint.

**AS TO JURISDICTION AND VENUE**

13. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 13 of the Amended Complaint.

14. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 14 of the Amended Complaint.

**AS TO FACTUAL ALLEGATIONS**

15. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 15 of the Amended Complaint.

16. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 16 of the Amended Complaint.

17. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 17 of the Amended Complaint.

18. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 18 of the Amended Complaint.

19. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 19 of the Amended Complaint.

20. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 20 of the Amended Complaint.

21. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 21 of the Amended Complaint.

22. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 22 of the Amended Complaint.

23. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 23 of the Amended Complaint.

24. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 24 of the Amended Complaint.

25. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 25 of the Amended Complaint.

26. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 26 of the Amended Complaint.

27. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 27 of the Amended Complaint.

28. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 28 of the Amended Complaint.

29. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 29 of the Amended Complaint.

30. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 30 of the Amended Complaint.

31. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 31 of the Amended Complaint.

32. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 32 of the Amended Complaint.

33. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 33 of the Amended Complaint.

34. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 34 of the Amended Complaint.

35. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 35 of the Amended Complaint.

36. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 36 of the Amended Complaint.

37. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 37 of the Amended Complaint.

38. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 38 of the Amended Complaint.

39. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 39 of the Amended Complaint.

40. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 40 of the Amended Complaint.

41. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 41 of the Amended Complaint.

42. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 42 of the Amended Complaint.

43. Chase admits the allegations contained in paragraph 43 of the Amended Complaint.

44. Chase admits the allegations contained in paragraph 44 of the Amended Complaint.

45. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 45 of the Amended Complaint.

46. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 46 of the Amended Complaint.

47. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 47 of the Amended Complaint.

48. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 48 of the Amended Complaint.

49. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 49 of the Amended Complaint.

50. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 50 of the Amended Complaint.

51. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 51 of the Amended Complaint.

52. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 52 of the Amended Complaint.

53. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 53 of the Amended Complaint.

**AS TO THE FIRST CAUSE OF ACTION**

54. Chase repeats and realleges each and every Answer to the previous 54 paragraphs of the Amended Complaint as though set forth more fully herein at length.

55. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 55 of the Amended Complaint.

56. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 56 of the Amended Complaint.

57. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 57 of the Amended Complaint.

58. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 58 of the Amended Complaint.

59. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 59 of the Amended Complaint.

60. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 60 of the Amended Complaint.

61. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 61 of the Amended Complaint.

62. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 62 of the Amended Complaint.

63. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 63 of the Amended Complaint.

64. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 64 of the Amended Complaint.

65. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 65 of the Amended Complaint.

66. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 66 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE SECOND CAUSE OF ACTION**

67. Chase repeats and realleges each and every answer to the previous 66 paragraphs of the Amended Complaint as though set forth more fully herein at length.

68. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 68 of the Amended Complaint.

69. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 69 of the Amended Complaint.

70. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 70 of the Amended Complaint.

71. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 71 of the Amended Complaint.

72. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 72 of the Amended Complaint.

73. Chase denies each and every allegation contained in paragraph 73 of the Amended Complaint.

74. Chase denies each and every allegation contained in paragraph 74 of the Amended Complaint.

75. Chase denies each and every allegation contained in paragraph 75 of the Amended Complaint.

76. Chase denies each and every allegation contained in paragraph 76 of the Second Cause of Action of the Amended Complaint

77. Chase denies each and every allegation contained in paragraph 77 of the Second Cause of Action of the Amended Complaint.

**WHEREFORE**, Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE THIRD CAUSE OF ACTION**

78. Chase repeats and realleges each and every answer to the previous 77 paragraphs of the Amended Complaint as though set forth more fully herein at length.

79. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 79 of the Amended Complaint.

80. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 80 of the Amended Complaint.

81. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 81 of the Amended Complaint.

82. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 82 of the Amended Complaint.

83. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 83 of the Amended Complaint.

84. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 84 of the Amended Complaint.

85. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 85 of the Amended Complaint.

86. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 86 of the Amended Complaint.

87. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 87 of the Amended Complaint.

88. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 88 of the Amended Complaint.

89. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 89 of the Amended Complaint.

90. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 90 of the Amended Complaint.

**WHEREFORE**, Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE FOURTH CAUSE OF ACTION**

91. Chase repeats and realleges each and every answer to the previous 90 paragraphs of the Amended Complaint as though set forth more fully herein at length.

92. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 92 of the Amended Complaint.

93. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 93 of the Amended Complaint.

94. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 94 of the Amended Complaint.

95. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 95 of the Amended Complaint.

96. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 96 of the Amended Complaint.

97. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 97 of the Amended Complaint.

98. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 98 of the Amended Complaint.

99. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 99 of the Amended Complaint.

100. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 100 of the Amended Complaint.

101. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 101 of the Amended Complaint.

102. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 102 of the Amended Complaint.

103. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 103 of the Amended Complaint.

104. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 104 of the Amended Complaint.

105. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 105 of the Amended Complaint.

106. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 106 of the Amended Complaint.

**WHEREFORE**, Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE FIFTH CAUSE OF ACTION**

107. Chase repeats and realleges each and every answer to the previous 106 paragraphs of the Amended Complaint as though set forth more fully herein at length.

108. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 108 of the Amended Complaint.

109. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 109 of the Amended Complaint.

110. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 110 of the Amended Complaint.

111. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 111 of the Amended Complaint.

112. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 112 of the Amended Complaint.

113. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 113 of the Amended Complaint.

114. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 114 of the Amended Complaint.

115. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 115 of the Amended Complaint.

116. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 116 of the Amended Complaint.

117. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 117 of the Amended Complaint.

118. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 118 of the Amended Complaint.

119. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 119 of the Amended Complaint.

120. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 120 of the Amended Complaint.

121. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 121 of the Amended Complaint.

122. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 122 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE SIXTH CAUSE OF ACTION**

123. Chase repeats and realleges each and every answer to the previous 122 paragraphs of the Amended Complaint as though set forth more fully herein at length.

124. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 124 of the Amended Complaint.

125. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 125 of the Amended Complaint.

126. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 126 of the Amended Complaint.

127. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 127 of the Amended Complaint.

128. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 128 of the Amended Complaint.

129. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 129 of the Amended Complaint.

130. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 130 of the Amended Complaint.

**WHEREFORE**, Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE SEVENTH CAUSE OF ACTION**

131. Chase repeats and realleges each and every answer to the previous 130 paragraphs of the Amended Complaint as though set forth more fully herein at length.

132. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 132 of the Amended Complaint.

133. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 133 of the Amended Complaint.

134. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 134 of the Amended Complaint.

135. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 135 of the Amended Complaint.

136. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 136 of the Amended Complaint.

137. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 137 of the Amended Complaint.

138. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 138 of the Amended Complaint.

139. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 139 of the Amended Complaint.

140. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 140 of the Amended Complaint.

141. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 141 of the Amended Complaint.

142. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 142 of the Amended Complaint.

143. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 143 of the Amended Complaint.

144. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 144 of the Amended Complaint.

145. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 145 of the Amended Complaint.

146. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 146 of the Amended Complaint.

147. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 147 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE EIGHTH CAUSE OF ACTION**

148. Chase repeats and realleges each and every answer to the previous 147 paragraphs of the Amended Complaint as though set forth more fully herein at length.

149. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 149 of the Amended Complaint.

150. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 150 of the Amended Complaint.

151. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 151 of the Amended Complaint.

152. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 152 of the Amended Complaint.

153. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 153 of the Amended Complaint.

154. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 154 of the Amended Complaint.

155. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 155 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE NINTH CAUSE OF ACTION**

156. Chase repeats and realleges each and every answer to the previous 155 paragraphs of the Amended Complaint as though set forth more fully herein at length.

157. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 157 of the Amended Complaint.

158. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 158 of the Amended Complaint.

159. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 159 of the Amended Complaint.

160. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 160 of the Amended Complaint.

161. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 161 of the Amended Complaint.

162. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 162 of the Amended Complaint.

163. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 163 of the Amended Complaint.

164. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 164 of the Amended Complaint.

165. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 165 of the Amended Complaint.

166. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 166 of the Amended Complaint.

167. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 167 of the Amended Complaint.

168. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 168 of the Amended Complaint.

169. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 169 of the Amended Complaint.

170. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 170 of the Amended Complaint.

171. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 171 of the Amended Complaint.

172. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 172 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE TENTH CAUSE OF ACTION**

173. Chase repeats and realleges each and every answer to the previous 172 paragraphs of the Amended Complaint as though set forth more fully herein at length.

174. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 174 of the Amended Complaint.

175. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 175 of the Amended Complaint.

176. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 176 of the Amended Complaint.

177. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 177 of the Amended Complaint.

178. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 178 of the Amended Complaint.

179. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 179 of the Amended Complaint.

180. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 180 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE ELEVENTH CAUSE OF ACTION**

181. Chase repeats and realleges each and every answer to the previous 180 paragraphs of the Amended Complaint as though set forth more fully herein at length.

182. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 182 of the Amended Complaint.

183. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 183 of the Amended Complaint.

184. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 184 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE TWELFTH CAUSE OF ACTION**

185. Chase repeats and realleges each and every answer to the previous 184 paragraphs of the Amended Complaint as though set forth more fully herein at length.

186. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 186 of the Amended Complaint.

187. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 187 of the Amended Complaint.

188. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 188 of the Amended Complaint.

189. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 189 of the Amended Complaint.

190. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 190 of the Amended Complaint.

191. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 191 of the Amended Complaint.

192. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 192 of the Amended Complaint.

193. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 193 of the Amended Complaint.

194. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 194 of the Amended Complaint.

195. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 195 of the Amended Complaint.

196. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 196 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AS TO THE THIRTEENTH CAUSE OF ACTION**

197. Chase repeats and realleges each and every answer to the previous 196 paragraphs of the Amended Complaint as though set forth more fully herein at length.

198. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 198 of the Amended Complaint.

199. Chase admits the allegations contained in paragraph 199 of the Amended Complaint

200. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 200 of the Amended Complaint.

201. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 201 of the Amended Complaint.

202. Chase admits the allegations contained in paragraph 202 of the Amended Complaint, however to the extent that the allegations contained in this paragraph allege any wrongdoing on the part of Chase, said allegations are specifically denied

203. Chase denies each and every allegation contained in paragraph 203 of the Amended Complaint

204. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 204 of the Amended Complaint.

205. Chase has neither the information nor the knowledge sufficient to either affirm or deny the allegations contained in paragraph 205 of the Amended Complaint.

206. Chase denies each and every allegation contained in paragraph 206 of the Amended Complaint.

207. Chase denies each and every allegation contained in paragraph 207 of the Amended Complaint.

**WHEREFORE,** Chase demands Judgment dismissing the Amended Complaint in its entirety together with costs, attorney's fees and such other and further relief as this Court deems equitable and just.

**AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**

Plaintiff has failed to state a claim upon which relief may be granted against this Defendant.

**SECOND AFFIRMATIVE DEFENSE**

Plaintiff is barred by the doctrine of estoppel.

**THIRD AFFIRMATIVE DEFENSE**

Plaintiff is barred by the virtue of the fact that any losses sustained by Plaintiff were not within the control of this Defendant and were the result of acts of third-parties over whom this Defendant had no control.

**FOURTH AFFIRMATIVE DEFENSE**

Any damages sustained by the Plaintiff herein were the direct and proximate result of Plaintiff's own actions and this Defendant may not be liable for any portion of said damages.

**FIFTH AFFIRMATIVE DEFENSE**

Plaintiff has failed to state a claim upon which relief can be granted inasmuch as Plaintiff has sustained no damages as a result of the allegations contained in the Complaint.

**SIXTH AFFIRMATIVE DEFENSE**

Chase is a bona fide purchaser for value without notice of any adverse claims.

**CROSS-CLAIM FOR CONTRIBUTION**

While denying any and all liability to the Plaintiff for any and all damages alleged in the Amended Complaint, Defendant JP Morgan Chase Bank, NA demands contribution from co-Defendants David Sadek, Winthrop Abstract, LLC, The Closing Network Ltd., and First Financial Equities, Inc., jointly, severally, and in the alternative for any and all sums recovered against JP Morgan Chase Bank, NA by Plaintiff, including interest, reasonable attorney's fees, and costs of suit.

**CROSS-CLAIM FOR INDEMNIFICATION**

While denying any and all liability due to the Plaintiff for any and all damages alleged in the Amended Complaint, Defendant JP Morgan Chase Bank, NA demands judgment against co-Defendants David Sadek, Winthrop Abstract, LLC, The Closing Network Ltd., and First Financial Equities, Inc. to be held harmless and for indemnification due to the claims of the Plaintiff together with costs and disbursements of this action, reasonable attorney's fees, and such other and further relief as this Court deems equitable and just under the circumstances.

**FEIN, SUCH, KAHN & SHEPARD, P.C.**  
Attorneys for Defendant,  
**JP MORGAN CHASE BANK, N.A.**



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**GREGG P. TABAKIN, ESQ.**  
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